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April 10, 2020

Duty Magistrate  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: USA v. Thomas Blaha  
20-MJ-172

Dear Sir/Madam:

I am the attorney for Defendant Thomas Blaha. On February 20, 2020, Mr. Blaha was arrested and arraigned before Hon. Vera M. Scanlon, who set terms and conditions of pretrial release. Among the conditions of Mr Blaha's pretrial release, Mr Blaha is required to post his Garden City, NY home, three (3) rental condominiums in Boca Raton, Florida and his stock in Memory Protection Devices, Inc, as security for the \$1million bond.

The Garden City home and corporate stock were to be pledged by February 27, 2020 and the Florida properties were to be pledged by today, March 5. The home and stock (the combined value of which exceed the \$1million bond) were promptly pledged by confession of judgment on, filed in the Nassau County Supreme Court, on February 25, 2020. Posting the Florida properties, however, has proven more difficult than expected. With the assistance of AUSA Karamigos, we have determined that mortgages will have to be filed in Palm Beach County.

Based on conversations with Florida attorneys and the uncertainties caused by the COVID-19 changes to government office staffing, I respectfully ask that Mr. Blaha's time to complete the pledge of the Florida condominiums be extended to June 10, 2020. I have spoken with AUSA Karamigos, who consents to this request.

The purpose of this letter is to ask the Court for an additional two weeks to continue to my efforts to pledge the Florida condominiums.

I thank the Court for its consideration.

Very truly yours,

*Kevin B. Faga*

Kevin B. Faga, Esq.

cc: AUSA Anna Karamigios, via email

**APPROVED**

*Cheryl Pollak*

United States Magistrate Judge  
Eastern District of NY

April 10, 2020